

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**RECEIVED
MAY 7 1996
FCC MAIL ROOM**

In the Matter of

Federal-State Joint Board on
Universal Service

)
)
)
)
)

CC Docket No. 96-45

DOCKET FILE COPY ORIGINAL

**Reply Comments of
Libraries for the Future**

Jamie McClelland
Libraries for the Future
521 Fifth Ave., Suite 1612
New York, NY 10175-1699
212-682-7446
lff@inch.com

May 6, 1996

No. of Copies rec'd 0+4
List ABCDE

I. Libraries for the Future

Libraries for the Future (LFF) is a national non-profit organization that advocates on behalf of active and potential users of America's free public library system. LFF initiates and supports grassroots organizing, demonstration projects, research, and public awareness activity to focus attention on the resources libraries now offer and those needed in the next century for a diverse civic community and a strong democracy. LFF works with Friends of the Library, but also represents powerful library constituencies among advocates of all kinds, including groups supporting literacy, democratic participation, young people, and senior citizens.

II. Role of the Library regarding Universal Service

Libraries for the Future strongly supports the comments of the American Library Association, particularly their designation of the library as an **institutional provider of public access** rather than a recipient of universal service benefits. With 15,000 branches nationwide, public libraries already constitute an extensive information network reaching rural and urban, wealthy and low income communities of all types in every corner of the country. The FCC's Rule Making on Universal Service should reflect this enormous potential by treating discounted services to public libraries as an opportunity for improving civic participation instead of a potential hindrance to economic competition. Rather than begin with a limited definition of Universal Service, as many telephone companies suggest, the FCC should begin with the broadest definition possible and restrict it only in cases where absolutely necessary.

Moreover, since the potential of libraries to offer public access to electronic

resources is often realized through innovative partnerships with community organizations, the FCC should interpret discounted access to advanced services to encompass these joint programs, even though the community organizations may not be designated as recipients of discounts on advanced services.

III. Discounts on Advanced Services for Libraries, Schools, and Health Care Providers

Many of those commenting point out that telecommunications costs are only one of the many costs involved in providing access to electronic information. MFS Communications Company, Inc and Telec Consulting Resources, for example, argue that the cost of a phone line and dial up Internet service is negligible compared to the price of computer hardware and wiring. Providing universal service discounts, they claim, will not significantly help libraries, schools and health care providers access electronic networks, but will hurt economic competition. Their comments suggest these institutions already have affordable access to communications and could best be served by healthy competition.

In fact, the opposite is true. Many rural libraries, such as the Aurora Free Library in upstate New York, have the equipment to access the Internet, but require a toll call to the nearest Internet Service Provider. The expense of this call makes accessing the Internet prohibitive. On the other hand, many urban libraries, such as the Brooklyn Public Library, have inexpensive dial up access to the Internet, however the size of their service population requires a broadband connection, which is significantly more expensive than a simple dial up connection.

Many libraries, both rural and urban, are facing severe budget cuts and

therefore desperately need a sustainable means for providing access to electronic information. This need is not currently being met. Furthermore, there is no indication that competition will drive prices sufficiently low enough to address this need.

Pacific Telesis Group approaches the cost-of-access problem in a different manner. They argue that since obtaining access to the network is only one aspect of using advanced technology, libraries, schools and health care providers should prove that they have made the necessary investment in equipment and training before receiving a discount. This seemingly reasonable argument fails to address a basic fact; although many libraries have only limited training and equipment in place, they still require the discounted access in order to educate themselves on how to properly apply the technology. For example, many libraries now offering public access to the Internet began by using their few computers to provide access for one or two librarians. These librarians taught themselves how to use the technology and were then able to make recommendations on implementing it throughout the library. For more advanced services, such as video-conferencing, the telecommunications charges are significantly more expensive than the line charges for email, making it unlikely that libraries will experiment and develop these services. Many libraries will also hesitate to invest fully in the equipment and training until they have had a chance to try it out in a limited setting. Providing reduced telecommunications rates for the broadband connections required for these services is essential in order for libraries to determine how best to apply them in the public interest.

The main consideration is that all libraries have equal and unquestioned

access to these advanced services, not simply the ones that can afford extensive equipment and training.

AT&T's comments address another potential barrier to the goals of universal service: consumer information. AT&T argues that carriers should not be required to inform schools, libraries, and health centers about available discounts. However, universal service is not exactly a household term, so few librarians or even administrators realize that they will be entitled to discounts. Universal Service is a hollow promise if this education does not take place. Since this service is to be provided by the telecommunications carriers, it is appropriate for them to be responsible for informing their customers.

Many of those commenting recognized these problems with equipment and training; however, rather than arguing for restricting access, they propose positive action toward resolving these problems. Libraries for the Future strongly supports the Benton Foundation's and the Michigan Library Association's comments regarding the need for a consumer advisory board. As the Benton Foundation points out, "As a form of consumer protection, the public will need ongoing consumer education so that individuals and organizations are aware of the options available to them." Benton suggests the model of the Wisconsin Advanced Telecommunications Foundation whose purpose is to establish and administrate an endowment fund to educate people about telecommunications services. Such an effort should not take the place of the telecommunications carriers' responsibility to inform the public of available discounts, but be in addition to it.

In terms of training, we support the comments of Access to Communications for Education. They suggest that a portion of Universal Service support funding

should be set aside for professional development and training and product development grants.

To address the problem of equipment expense, we support Benton's comments regarding the need for a coordinated effort to recycle and refurbish older equipment to deliver basic machines in households and communities that need them. Though organizations are pursuing this effort with success, they require a coordinated funding stream to continue on a national scale.

Access to telecommunications is indeed only one small part of meeting the goals of Universal Access. The FCC should act on this problem by expanding their definition rather than limiting it.

IV. Partnerships with Community Organizations

Many libraries have overcome their limited education, training and equipment by partnering with community organizations in innovative ways. Most significantly, libraries around the country have teamed up with community networks and Free-Nets (non-profit organizations providing equipment, training, and an electronic network for community communication and information). In Charlotte, Pittsburgh, Tallahassee, and Seattle, just to name a few, these partnerships have had tremendous results. The community networks have provided hardware and computer expertise, while the libraries have provided a public space and community expertise. These partnerships have even gone beyond the library to other community organizations. In Charlotte, a local AIDS service provider, among other service organizations, has placed information on the community network which is accessible from the library. In Seattle, the Seattle Community Network

holds community training sessions for users in branch libraries. These partnerships are realizing the goals of Universal Service despite the problems identified above.

Unfortunately, many of these partnerships are threatened with the Universal Service prohibition on the resale of service. Telec Consulting Resources, Inc. argues that institutions which receive telecommunications services from others should not be allowed to resell or provide those services to third parties and still receive Universal Service support. Libraries for the Future, on the other hand, supports the American Library Association's comments regarding this provision:

Restrictions on resale of telecommunications services or network capacity should not be interpreted to preclude computer lab fees for students, or user fees for special applications, resources, or services. Transferring service/capacity for money or other value among eligible entities should not be forbidden, so that state and regional consortia and cooperatives of libraries and schools are not precluded from customary collaborative activity. Multi-type library and educational arrangements using public funding to enable the sharing of library resources and educational information from, as an example, higher education institutions to schools and public libraries should be able to require membership financial or other support for telecommunications services without triggering ineligibility of the cooperative arrangement for the discount. An educational or library-resource sharing network eligible for the discount should not become ineligible simply through sharing a network with governmental entities, community social service agencies or other nonprofit entities.

The FCC must clearly state that this resale provision will not hinder partnerships with other non-profit organizations, especially community networks or Free-Nets, even though some charge nominal annual fees for their services. It would be unfortunate if libraries were forced to distance themselves from these advantageous partnerships in order to receive discounts on advanced services.

V. The Future of the Library

When determining Universal Service definitions, the FCC must recognize the tremendous potential for new relationships involving libraries, schools and health centers. Toward this end, we support the Missouri Public Service Commission's suggestion to construe the term "library" to include community information networks. They argue that some governments and other public entities establish separate nonprofit public benefit corporations for the primary purpose of developing and maintaining computing services for the general public. LFF defines "community information networks" even more broadly--to include the myriad of actual and potential partnerships between libraries and other organizations that may radically transform how the public accesses information.

The very definition of the public library is changing as a result of telecommunications. The FCC must understand this change broadly so that public libraries have the greatest freedom in evolving to meet new community information needs.